

RECEIVED**David Fiske**

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From: Paul Butler [butler@eot.net]**Sent:** Thursday, December 01, 2005 9:38 AM**To:** David Fiske**Cc:** KJMWEB; Kathleen Abernathy; Michael Copps; Jonathan**Subject:** VoIP and E911Federal Communications Commission
Office of the Secretary

05-196

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Dear David:

I read the article about the dead line for E911 of VoIP and I must tell you I applaud the FCC in not extending the dead line. My company is a small NY base CLEC / IXC / ISP and VoIP Provider. It is with a lack of common sense that people would assume that public safety would not be an issue with VoIP as was CALEA. We began preparing for VoIP about 15 months ago and preparing our product launch which is scheduled for January 15th with E911 in all markets we will serve. Since VoIP over Broadband's inception the first thing that came to my mind was E911 and CALEA. As a Telecom Professional and Business Person you must evaluate your product offering and make assessments from every angle. I find it hard to believe with all the educated people in this market there were so many in denial about the importance of Emergency Services and CALEA especially after September 11th.

I applaud the FCC again with its decision not to extend the dead line. Many of the RBOCs we have spoken to have commercialized E911 so anybody can buy it. What is there delay with the VoIP providers making quick arrangements? There is too much liability and risk if the Emergency Services are not available to Consumers. Can you imagine the horror stories that will come if the Consumer is not protected? Consumers don't have PBXs with back up analog lines. People are replacing their home phones, and the majority of consumers only have 1. It is the job of the FCC to ensure that the services offered have bench marks and protect the consumers. One thing that a consumer wouldn't do is replace their home phone if they had no incoming calls. They could still buy the cheap outbound only service, and therefore would not be a primary line replacement. The FCC could allow VoIP providers to only sell outbound service and not allow incoming where they don't have E911, just my thoughts from outside the box but on the table. That would allow them to add customers while they implement E911, and it would allow the consumer to test drive their service before porting their numbers. Perhaps this could be a temporary solution or maybe a middle ground. Though I will compete with these VoIP providers shortly I feel their model of VoIP Only is flawed just as was UNEP was and we stay away from that model. The ball is in the hands of the FCC, though you may have some critics I believe in the system.

Paul A Butler
COO
Empire One Telecom
55 Washington Street 9th Floor
Brooklyn NY 11201
(O) 718-801-8111
(M) 917-553-7285
butler@eot.net
http://www.eot.net

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